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IN THE UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

JAN 23 2008 *new*

Jan 23, 2008

MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURTLOUIS C. SHEPTIN,  
PLAINTIFF

Case # 08-C-0116

VERSUS

Hon. M. Kennedy, Judge

DR. D. HARVEY, CLINICAL,  
DIRECTOR MCC,  
DEFENDANT

JURY TRIAL DEMAND

EMERGENCY ACTION

EMERGENCY ACTION:

PLAINTIFF'S COMPLAINT AND MOTION  
TO CONVERT THIS ACTION TO  
A CIVIL COMPLAINT WITHOUT  
NECESSITY OF EXHAUSTING  
ADMINISTRATIVE REMEDIES BASED  
ON PROOF IMMINENT BODILY

DANGER

MCC CHICAGO PHARMACY (312) 322-0567  
71 W. VAN BUREN - CHICAGO, IL 60605  
107093 P. HARVEY 01/16/08  
SHEPTIN, LOUIS CHARLES 90355-024  
MCC CHICAGO - C03-019L  
TAKE ONE TABLET BY MOUTH EACH DAY

AMLODIPINE 10 MG TAB

(0) Refills 01/16/2008 IL

#20  
RXP 02/14/08CAUTION: Federal/State law prohibits transfer of this drug  
to any person other than patient for whom prescribed.

Rec'd 1/16/08  
P. Harve

WAS TOLD TO TAKE THIS  
MEDICATION OR BE PUT  
IN SHU FOR FAILURE  
TO FOLLOW DIRECT ORDER

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## I. JURISDICTION:

1) THE JURISDICTION OF THIS HONORABLE COURT IS INVOKED PURSUANT TO TITLE 28 USC 1331, OR IN THE ALTERNATIVE PLAINTIFF SEEKS HIS RELEASE UNDER 28 USC 2241, HARRIS CORPUS ACT, SEE ALSO 28 USC 1651 ALL WRITS ACT.

## II. STATEMENT OF CASE & FACTS:

2) THE PLAINTIFF INCORPORATED HEREIN HIS APPLICATION FOR WRIT OF HABEAS CORPUS AND SUPPLEMENT THERETO WITH EXHIBITS

ATTACHED THERETO, SHOWING MED RECORDS DATED 12/7 2001/2 SEE DOC 1, 2, 3, AND 4

3) PLAINTIFF CITES THAT BASED UPON MEDICAL RECORDS HE IS HYPOTENSIVE AND TAKES NO MEDICATION TO LOWER BLOOD PRESSURE; AND THAT MEDICATIONS TO LOWER BLOOD PRESSURE COULD KILL PLAINTIFF OR COLLAPSE A STENTED ARTERY<sup>1/</sup>, OR CAUSE M.I.

— 2 —

<sup>1/</sup> ESPECIALLY A NEWLY STENTED ARTERY.  
PLAINTIFF HAS NEVER TAKEN OR BEEN GIVEN Anti Hypertensives

4) THAT AS LATE AS JANUARY 16, 2008  
 AS EVIDENCED BY MEDICATION ORDER  
 ATTACHED TO PAGE ONE, DR. HARVEY  
 CONTINUES TO PRESCRIBE JANE T. CAIL'S  
 BLOOD PRESSURE MEDICATION TO  
 PLAINTIFF, DISPIE THE FACT<sup>11</sup> THAT  
 RECORDS SHOW PLAINTIFF HAS BEEN  
 HOSPITALIZED WITH LOW BLOOD PRESSURE  
 AND AS RECENT AS JANUARY 9, 2008  
 WAS HOSPITALIZED WITH PTCA ANGIO-  
 PLASTY, AND WAS STENTED AT U.I.C. MED CENTER.

5) PLAINTIFF BELIEVES HARVEY IS TRYING  
 TO DO BODILY HARM<sup>11</sup> TO PLAINTIFF,  
 AND/OR TRYING TO CAUSE CARDIAC  
 COLLAPSE BY PRESCRIBING NORVASID -  
 AMLODIPINE TO HER, TO PLAINTIFF, WHEN  
 THIS MEDICATION IS NOT MEDICALLY INDICATED.

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<sup>11</sup> PLAINTIFF INFORMED HARVEY ON 12/26/08 OF THIS ERROR.

6) BECAUSE OF DEFENDANT'S CONTINUED ATTEMPTS ON PLAINTIFF'S LIFE OR CONTINUED GROSS NEGLIGENCE YOUR PLAINTIFF MOVES FOR THE FOLLOWING RELIEF: TRIAL ON MERITS AND:

### III RELIEF:

1) FIND THAT PLAINTIFF FACES IMMINENT BODILY DANGER AT THE HANDS OF DEFENDANT P. HARVEY.

2) AWARD PUNITIVE DAMAGES OF ONE MILLION DOLLARS.

3) AWARD COMPENSATION IN AN AMOUNT THE COURT DEEMS JUST AND PROPER, OR IN THE ALTERNATIVE RELEASE PLAINTIFF FROM CONFINEMENT WHICH PLACES PLAINTIFF IN IMMINENT BODILY DANGER, AND AWARD ATTORNEY FEES AND COSTS OF COURT AND:

4) AS PROOF OF DEFENDANT'S GROSS ATTEMPT ON PLAINTIFF'S LIFE HE SHOWS

AN ELECTROCARDIOGRAM TAKEN ON  
 DECEMBER 07, 2007 WHICH A BLOOD  
 PRESSURE RECORDED ON FRONT OF  
 94/43 (HYPO-TENSIVE). ADDITIONALLY  
 PLAINTIFF ATTACHS A COPY OF HIS  
 DISCHARGE MEDICATIONS, NONE OF  
 WHICH ARE FOR BLOOD PRESSURE. <sup>1/</sup>

PLAINTIFF SEEKS THE IMMEDIATE  
 SERVICE OF THIS COMPLAINT ON HARVEY  
 WITH THE RE-APPOINTMENT OF JENNIFER  
 AND BLOCK PRO BONO. SO PRAYS YOUR PLAINTIFF

MOST RESPECTFULLY SUBMITTED  
 for Chris D. [Signature]

LEWIS CHARLES SHERIDAN  
 71 WEST VAN BUREN ST  
 CHICAGO, IL 60605

ATTACHMENTS EXHIBIT MARKED 'B' DISCHARGE MEDICATION  
 EXHIBIT MARKED "C" EKG WITH BP 94/43

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1/ NONE ARE ANTI-HYPOTENSIVES, HOWEVER SOME LOWER BP AS

**Saint Anthony Hospital**  
1000 North Lee, Oklahoma City, Oklahoma 73102

ST ANTHONY HOSPITAL

\* SHEPTIN, LOUIS I/P  
0734100419 CAR 3005-01  
10/23/1948 59Y M 12/07/07  
SUTOR, RONALD 000511770

**Inpatient Discharge Instructions****Diagnoses and Comments:**

CAD w/ Stent      Seizure Disorder  
Hx AFib      @ Shoulder soft tissue injury  
Hepatitis C  
GERD

**Appointments:**

Physician: Dr. Cantore Medical Clinic date/time: \_\_\_\_\_

**Special Instructions:**

Diet: Healthy Heart Activity: NO Lifting for 1 week

Other: (laboratory, physical therapy, return to work, etc)

Home Health: \_\_\_\_\_

phone: \_\_\_\_\_

**Medications:** (name, dosage, how often)

Ec Aspirin 325 daily po  
Plavix 75mg  
Vitamin 10/40 every evening  
Sotalol 40mg  
Zantac 150mg TID daily  
Dilantin 300mg every day  
NTG 0.4mg SL PRN chest pain  
Tylenol 325 1-2 tabs q 4 hrs PRN pain

If you have questions, call: \_\_\_\_\_

phone: \_\_\_\_\_

"I understand, and have received a copy of this discharge plan"

(signature of patient or guardian): [Signature]

date: 12-10-07

Physician signature: \_\_\_\_\_

date: \_\_\_\_\_

discharging nurse: [Signature]

date: 12-10-07

faxed to: \_\_\_\_\_

fax number: \_\_\_\_\_

date & time faxed: \_\_\_\_\_

initials: \_\_\_\_\_

SHEPTIN, LOUIS  
ID: 90355024

12/07/07 8:30:10

Sinus rhythm  
Left axis deviation - anterior fascicular block  
Possible old inferior infarct  
Possible anterior infarct

\* Unconfirmed Analysis \*

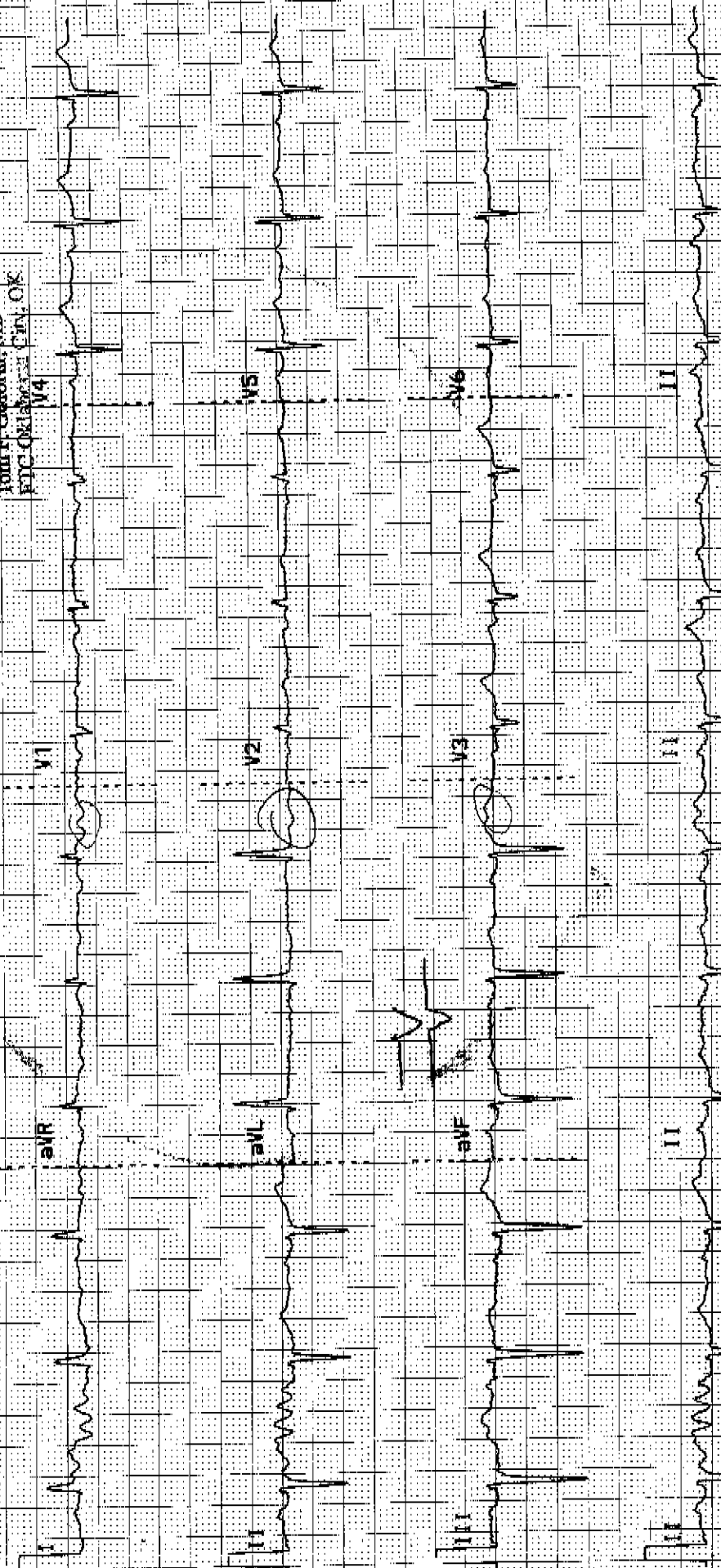
### Abnormal ECG

BP 94/43 - 866 R16

**L. Weiss, and  
FIC Oklahoma City, OK**

DEC 1 2007

Tom F. Gelford, MD  
Eric O'Leary, MD, PhD

[illegible]25 mm/s  
STABLE 40 Hz